

# DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING

## OFFENSE CHARGED

18 U.S.C. § 1349 [Conspiracy to Commit Bank Fraud and Wire Fraud]; 18 U.S.C. § 1343 [Wire Fraud]; 18 U.S.C. § 1956(h) [Conspiracy to Commit Money Laundering]; 18 U.S.C. § 1957 (a) [Monetary Transactions Using Criminally Derived Property]; 18 U.S.C. § 911 [False Claim to United States Citizenship]; 18 U.S.C. § 982 (a)(i) and (2) [Criminal Forfeiture]

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: See Attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA MAY 27 2010

OAKLAND DIVISION

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

## DEFENDANT - U.S.

ANDREW ASHIEGBU

DISTRICT COURT NUMBER

CR10-00422

CW

## PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

IRS - CI and ICE

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW  
DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE  
CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form JOSEPH P. RUSSONIELLO

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) Deborah R. Douglas, AUSA

## IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

## IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction

☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☒ No

If "Yes" give date filed

DATE OF  
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

## ADDITIONAL INFORMATION OR COMMENTS

### PROCESS:

☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time:

Before Judge:

Comments:

**ATTACHMENT: MAXIMUM PENALTIES**

**COUNT ONE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, Doris Anyanwu, Hyacinth Udeh, and Ursula Ogamba

VIOLATION: 18 U.S.C. § 1349 [Conspiracy to Commit Bank Fraud and Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS TWO THROUGH FIVE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, and Doris Anyanwu

VIOLATION: 18 U.S.C. § 1343 [Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS SIX THROUGH NINE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, Hyacinth Udeh, and Ursula Ogamba

VIOLATION: 18 U.S.C. § 1343 [Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNT TEN**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, Doris Anyanwu, and Hyacinth Udeh

VIOLATION: 18 U.S.C. § 1956(h) [Conspiracy to Commit Money Laundering]

PENALTY: 20 years imprisonment, three years supervised release, \$500,000 fine or twice the value of the property involved in the transaction, whichever is greater, and \$100 special assessment

**COUNTS ELEVEN THROUGH EIGHTEEN**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, and Doris Anyanwu

VIOLATION: 18 U.S.C. § 1957(a) [Monetary Transactions Using Criminally Derived Property]

PENALTY: 10 years imprisonment, three years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS NINETEEN THROUGH TWENTY-TWO**

DEFENDANT: Doris Anyanwu

VIOLATION: 18 U.S.C. § 911 [False Claim to United States Citizenship]

PENALTY: 3 years imprisonment, one year supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS TWENTY-THREE THROUGH TWENTY-EIGHT**

DEFENDANT: Hyacinth Udeh

VIOLATION: 18 U.S.C. § 911 [False Claim to United States Citizenship]

PENALTY: 3 years imprisonment, one year supervised release, \$250,000 fine, and \$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
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☐ SUPERSEDING
**OFFENSE CHARGED**

18 U.S.C. § 1349 [Conspiracy to Commit Bank Fraud and Wire Fraud]; 18 U.S.C. § 1343 [Wire Fraud]; 18 U.S.C. § 1956(h) [Conspiracy to Commit Money Laundering]; 18 U.S.C. § 1957 (a) [Monetary Transactions Using Criminally Derived Property]; 18 U.S.C. § 911 [False Claim to United States Citizenship]; 18 U.S.C. §§ 982 (a)(1) and (2) [Criminal Forfeiture]

☐ Petty  
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☒ Felony

PENALTY: See Attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

**DEFENDANT - U.S.**

LINDA ASHIEGBU

DISTRICT COURT NUMBER

CR10-00422

**FILED**

MAY 27 2010

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

CW

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

IRS - CI and ICE

☐ person is awaiting trial in another Federal or State Court, give name of court

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Furnishing Information on this form JOSEPH P. RUSSONIELLO

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) Deborah R. Douglas, AUSA

**IS NOT IN CUSTODY**

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☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

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**ATTACHMENT: MAXIMUM PENALTIES**

**COUNT ONE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, Doris Anyanwu, Hyacinth Udeh, and Ursula Ogamba

VIOLATION: 18 U.S.C. § 1349 [Conspiracy to Commit Bank Fraud and Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS TWO THROUGH FIVE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, and Doris Anyanwu

VIOLATION: 18 U.S.C. § 1343 [Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS SIX THROUGH NINE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, Hyacinth Udeh, and Ursula Ogamba

VIOLATION: 18 U.S.C. § 1343 [Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNT TEN**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, Doris Anyanwu, and Hyacinth Udeh

VIOLATION: 18 U.S.C. § 1956(h) [Conspiracy to Commit Money Laundering]

PENALTY: 20 years imprisonment, three years supervised release, \$500,000 fine or twice the value of the property involved in the transaction, whichever is greater, and \$100 special assessment

**COUNTS ELEVEN THROUGH EIGHTEEN**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, and Doris Anyanwu

VIOLATION: 18 U.S.C. § 1957(a) [Monetary Transactions Using Criminally Derived Property]

PENALTY: 10 years imprisonment, three years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS NINETEEN THROUGH TWENTY-TWO**

DEFENDANT: Doris Anyanwu

VIOLATION: 18 U.S.C. § 911 [False Claim to United States Citizenship]

PENALTY: 3 years imprisonment, one year supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS TWENTY-THREE THROUGH TWENTY-EIGHT**

DEFENDANT: Hyacinth Udeh

VIOLATION: 18 U.S.C. § 911 [False Claim to United States Citizenship]

PENALTY: 3 years imprisonment, one year supervised release, \$250,000 fine, and \$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING

**OFFENSE CHARGED**

18 U.S.C. § 1349 [Conspiracy to Commit Bank Fraud and Wire Fraud]; 18 U.S.C. § 1343 [Wire Fraud]; 18 U.S.C. § 1956(h) [Conspiracy to Commit Money Laundering]; 18 U.S.C. § 1957 (a) [Monetary Transactions Using Criminally Derived Property]; 18 U.S.C. § 911 [False Claim to United States Citizenship]; 18 U.S.C. §§ 982 (a)(1) and (2) [Criminal Forfeiture]

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PENALTY: See Attachment

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

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☐ person is awaiting trial in another Federal or State Court, give name of court

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SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form JOSEPH P. RUSSONIELLO

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

Deborah R. Douglas, AUSA

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

DORIS ANYANWU

DISTRICT COURT NUMBER

CR10-00422

CW

**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

4) ☐ On this charge

5) ☐ On another conviction

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6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☒ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... If Arresting Agency &amp; Warrant were not

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Month/Day/Year

☐ This report amends AO 257 previously submitted

**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**

☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

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Defendant Address:

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Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments:

**ATTACHMENT: MAXIMUM PENALTIES**

**COUNT ONE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, Doris Anyanwu, Hyacinth Udeh, and Ursula Ogamba

VIOLATION: 18 U.S.C. § 1349 [Conspiracy to Commit Bank Fraud and Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS TWO THROUGH FIVE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, and Doris Anyanwu

VIOLATION: 18 U.S.C. § 1343 [Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS SIX THROUGH NINE**

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VIOLATION: 18 U.S.C. § 1956(h) [Conspiracy to Commit Money Laundering]

PENALTY: 20 years imprisonment, three years supervised release, \$500,000 fine or twice the value of the property involved in the transaction, whichever is greater, and \$100 special assessment



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PENALTY: 10 years imprisonment, three years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS NINETEEN THROUGH TWENTY-TWO**

DEFENDANT: Doris Anyanwu

VIOLATION: 18 U.S.C. § 911 [False Claim to United States Citizenship]

PENALTY: 3 years imprisonment, one year supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS TWENTY-THREE THROUGH TWENTY-EIGHT**

DEFENDANT: Hyacinth Udeh

VIOLATION: 18 U.S.C. § 911 [False Claim to United States Citizenship]

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AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
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**OFFENSE CHARGED**

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☐ Petty  
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PENALTY: See Attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

MAY 27 2010

DEFENDANT - U.S.

HYACINTH UDEH

DISTRICT COURT NUMBER

CR10-00422

 RICHARD W. WIEKING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND

CW

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

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☐ person is awaiting trial in another Federal or State Court, give name of court

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 Name and Office of Person  
 Furnishing Information on this form JOSEPH P. RUSSONIELLO

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.  
 Attorney (if assigned) Deborah R. Douglas, AUSA
**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

 1) ☒ If not detained give date any prior summons was served on above charges

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If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☒ No

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DATE OF ARREST

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Bail Amount: No Bail

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Defendant Address:

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Date/Time: Before Judge:

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**ATTACHMENT: MAXIMUM PENALTIES**

**COUNT ONE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, Doris Anyanwu, Hyacinth Udeh, and Ursula Ogamba

VIOLATION: 18 U.S.C. § 1349 [Conspiracy to Commit Bank Fraud and Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS TWO THROUGH FIVE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, and Doris Anyanwu

VIOLATION: 18 U.S.C. § 1343 [Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS SIX THROUGH NINE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, Hyacinth Udeh, and Ursula Ogamba

VIOLATION: 18 U.S.C. § 1343 [Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNT TEN**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, Doris Anyanwu, and Hyacinth Udeh

VIOLATION: 18 U.S.C. § 1956(h) [Conspiracy to Commit Money Laundering]

PENALTY: 20 years imprisonment, three years supervised release, \$500,000 fine or twice the value of the property involved in the transaction, whichever is greater, and \$100 special assessment

**COUNTS ELEVEN THROUGH EIGHTEEN**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, and Doris Anyanwu

VIOLATION: 18 U.S.C. § 1957(a) [Monetary Transactions Using Criminally Derived Property]

PENALTY: 10 years imprisonment, three years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS NINETEEN THROUGH TWENTY-TWO**

DEFENDANT: Doris Anyanwu

VIOLATION: 18 U.S.C. § 911 [False Claim to United States Citizenship]

PENALTY: 3 years imprisonment, one year supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS TWENTY-THREE THROUGH TWENTY-EIGHT**

DEFENDANT: Hyacinth Udeh

VIOLATION: 18 U.S.C. § 911 [False Claim to United States Citizenship]

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**OFFENSE CHARGED**

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PENALTY: See Attachment

Name of District Court, and/or Judge/Magistrate Location

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OAKLAND DIVISION

DEFENDANT - U.S.

URSULA OGAMBA

DISTRICT COURT NUMBER

CR10-00422

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☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Deborah R. Douglas, AUSA

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Date/Time:

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Comments:

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**COUNT ONE**

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PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS TWO THROUGH FIVE**

DEFENDANTS: Andrew Ashiegbu, Linda Ashiegbu, and Doris Anyanwu

VIOLATION: 18 U.S.C. § 1343 [Wire Fraud]

PENALTY: 30 years imprisonment, five years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS SIX THROUGH NINE**

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PENALTY: 10 years imprisonment, three years supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS NINETEEN THROUGH TWENTY-TWO**

DEFENDANT: Doris Anyanwu

VIOLATION: 18 U.S.C. § 911 [False Claim to United States Citizenship]

PENALTY: 3 years imprisonment, one year supervised release, \$250,000 fine, and \$100 special assessment

**COUNTS TWENTY-THREE THROUGH TWENTY-EIGHT**

DEFENDANT: Hyacinth Udeh

VIOLATION: 18 U.S.C. § 911 [False Claim to United States Citizenship]

PENALTY: 3 years imprisonment, one year supervised release, \$250,000 fine, and \$100 special assessment

**United States District Court**

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

**FILED**  
MAY 27 2010

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

UNITED STATES OF AMERICA,

V.

**CR10-00422** *CW*

ANDREW ASHIEGBU, LINDA  
ASHIEGBU, DORIS ANYANWU,  
HYACINTH UDEH, and URSULA  
OGAMBA,

DEFENDANT(S).

**INDICTMENT**

18 U.S.C. § 1349 [Conspiracy to Commit Bank Fraud and Wire  
Fraud]; 18 U.S.C. § 1343 [Wire Fraud]; 18 U.S.C. § 1956(h)  
[Conspiracy to Commit Money Laundering]; 18 U.S.C. § 1957(a)  
[Monetary Transactions Using Criminally Derived Property];  
18 U.S.C. § 911 [False Claim to United States Citizenship];  
18 U.S.C. §§ 982 (a)(i) and (2) [Criminal Forfeiture]

A true bill.

*Walter Badley*

Foreman

Filed in open court this \_\_\_\_\_ day of \_\_\_\_\_

*5/27/2010*

*[Signature]*

Clerk

Bail, \$ no bail warrants



JOSEPH P. RUSSONIELLO (CABN 44332)  
United States Attorney

FILED

MAY 27 2010

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

CR10-00422

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW ASHIEGBU,  
LINDA ASHIEGBU,  
DORIS ANYANWU,  
HYACINTH UDEH, and  
URSULA OGAMBA,

Defendants.

Criminal No.

VIOLATIONS: 18 U.S.C. § 1349  
[Conspiracy to Commit Bank Fraud and  
Wire Fraud] (one count); 18 U.S.C. § 1343  
[Wire Fraud] (eight counts); 18 U.S.C.  
§ 1956(h) [Conspiracy to Commit Money  
Laundering] (one count); 18 U.S.C.  
§ 1957(a) [Monetary Transactions Using  
Criminally Derived Property] (eight counts);  
18 U.S.C. § 911 [False Claim to United  
States Citizenship] (ten counts); 18 U.S.C.  
§§ 982(a)(1) and (2) [Criminal Forfeiture]

OAKLAND VENUE

INDICTMENT

The Grand Jury charges:

At all times relevant to this indictment:

1. Defendant Andrew Ashiegbu was a broker licensed by the State of California, Department of Real Estate, and, together with his wife defendant Linda Ashiegbu, owned New Era Mortgage and Realty ("New Era Mortgage"), a mortgage and real estate business in Union City, California.

3. Defendant Doris Anyanwu, the sister of defendant Linda Ashiegbu, was an individual residing in San Ramon, California.

4. Defendant Hyacinth Udeh, the husband of defendant Doris Anyanwu during part of the relevant period, was licensed as a salesperson by the State of California, Department of Real Estate, under broker Andrew Ashiegbu at New Era Mortgage.

5. Defendant Ursula Ogamba was licensed as a broker and/or salesperson by the State of California, Department of Real Estate, at EZ Mortgage Realty (“EZ Mortgage”), a mortgage and real estate business in Tracy, California, owned by defendant Ursula Ogamba and her husband, the latter of whom was the broker of record for EZ Mortgage.

latter of which was the broker of record for EZ Mortgage.

## The Scheme to Defraud

6. Beginning no later than in or about May 2005, and continuing until in or about February 2007, in the Northern District of California and elsewhere, the defendants, Andrew Ashiegbu, Linda Asheigbu, Hyacinth Udeh, Doris Anyanwu, and Ursula Ogamba, did knowingly and intentionally devise and execute, and attempt to execute, a material scheme and artifice to defraud Countrywide Bank, N.A., and IndyMac Bank, financial institutions federally insured by the Federal Deposit Insurance Corporation, and other lending institutions to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, those financial and other lending institutions by means of material false and fraudulent pretenses, representations, and promises, and material omissions of fact. Defendants secured at least ten loans, totaling approximately \$3,679,000 in loan proceeds, from financial and other lending institutions based on false and fraudulent representations. Defendants laundered the proceeds from specified unlawful activities, namely, bank fraud and wire fraud, by causing funds to be disbursed from the ten escrow accounts opened by defendants Doris Anyanwu and Hyacinth Udeh.

7. Countrywide Bank, N.A., and Countrywide Home Loans, Inc. (dba America's Wholesale Lender) used the Bank of New York Mellon to wire the loan proceeds through Centennial Bank in Englewood, Colorado, to Alliance Title in California, thereby affecting interstate commerce.

The other lenders, such as WMC Mortgage, IRES Co., and ABN AMRO, wired the mortgage proceeds to the title companies through the Federal Reserve Bank's Fedwire Funds Transfer System ("Fedwire"). All proceeds wired through Fedwire are transmitted to the Federal Reserve Bank's processing center in New Jersey prior to the proceeds being wired to the beneficiary, thereby affecting interstate commerce.

COUNT ONE: (18 U.S.C. § 1349 - Conspiracy to Commit Bank Fraud and Wire Fraud)

8. The factual allegations contained in paragraphs one through seven are realleged and incorporated by reference as though fully set forth herein.

9. Beginning at a time unknown to the Grand Jury, but no later than in or about May 2005, and continuing until in or about February 2007, in the Northern District of California and elsewhere, the defendants,

ANDREW ASHIEGBU,  
LINDA ASHIEGBU,  
DORIS ANYANWU,  
HYACINTH UDEH, and  
URSULA OGAMBA,

did knowingly attempt and conspire to commit offenses under Chapter 63 of Title 18, United States Code, namely, bank fraud and wire fraud, in violation of Title 18, United States Code, Sections 1344 (1) & (2) and 1343.

Manner and Means of the Conspiracy

10. The manner and means the defendants used to carry out the conspiracy included the following:

a. The defendants fraudulently obtained mortgage proceeds from financial institutions and other lending institutions for the purchase of four residential properties located at (i) 7210 MacArthur Boulevard, Oakland, California; (ii) 1192 Huron Lane, Hayward, California; (iii) 557 Adriatic Court, San Ramon, California; and (iv) 2752 Plover Court, Hayward, California; and the refinance of the property at 1192 Huron Lane, Hayward, California.

b. The defendants caused the mortgage loan applications to be prepared based upon fraudulent representations, including overstated gross monthly income, overstated asset balances, and false claims of United States citizenship. Fraudulent documentation such as

1 Verifications of Rent, Verifications of Employment, W-2 Forms, and altered bank statements were  
2 submitted with the fraudulent loan applications.

3 c. The defendants recruited other individuals to assist in providing information  
4 to the lenders that gave the lenders a false representation of the financial standing of the borrowers.

5 d. The defendants caused defendant Hyacinth Udeh to be used as a straw buyer  
6 for the purchase of defendants Andrew Ashiegbu's and Linda Ashiegbu's residential property located  
7 at 2752 Plover Court, Hayward, California, and further caused "show money" to be deposited into  
8 the escrow account during the period of escrow to defraud lenders into believing that defendant  
9 Hyacinth Udeh had a sufficient down payment for the purchase of that property.

10 e. The defendants caused the loan packages, which included the fraudulent loan  
11 applications, fraudulent documentation, and adjustable rate notes promising to pay the loans, to be  
12 submitted to financial institutions such as Countrywide Bank, N.A., and IndyMac Bank, and other  
13 lending institutions such as WMC Mortgage, IRES Co., Countrywide Home Loans (dba America's  
14 Wholesale Lender), and ABN AMRO.

15 f. At the direction of the defendants, the loan proceeds were wired by financial  
16 and other lending institutions through interstate commerce to the title companies and deposited into  
17 escrow accounts at the title companies under false and fraudulent pretenses for the purchase and/or  
18 refinance of the real estate properties.

19 g. At the direction of the defendants, the title companies disbursed proceeds from  
20 the escrow accounts which included payments to defendants Doris Anyanwu, Hyacinth Udeh,  
21 Andrew Ashiegbu, Linda Ashiegbu, the Ashiegbus' business at New Era Mortgage, and two  
22 individuals who had provided loans used as "show money" for defendant Hyacinth Udeh's purchase  
23 of defendants Andrew Ashiegbu's and Linda Ashiegbu's residential property at 2752 Plover Court,  
24 Hayward, California.

25 All in violation of Title 18, United States Code, Section 1349.  
26  
27  
28

COUNTS TWO THROUGH FIVE: (18 U.S.C. § 1343 - Wire Fraud)

11. The factual allegations contained in paragraphs one through seven and ten are realleged and incorporated by reference as though fully set forth herein.

12. Beginning at a time unknown to the Grand Jury, but no later than on or about June 15, 2005, and continuing until on or about September 13, 2006, in the Northern District of California and elsewhere, the defendants,

ANDREW ASHIEGBU,  
LINDA ASHIEGBU, and  
DORIS ANYANWU,

did knowingly and intentionally devise a material scheme and artifice to defraud financial and other lending institutions and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by material omissions of fact, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted by means of wire communications in interstate commerce certain writings, signs, and signals, namely, the wire transfers identified below:

Count	Wire Date	Property	Borrower	Financial/ Lending Institution	Loan #	Loan Amount	Escrow Co. & Escrow #	Wire Amount
2	6/15/05	1192 Huron Lane, Hayward, CA	Doris Anyanwu	IRES Co.	10805	\$464,000	First American Title  0106- 1851417	\$467,367.32
3	6/15/05	1192 Huron Lane, Hayward, CA	Doris Anyanwu	IRES Co.	10806	\$58,000	First American Title  0106- 1851417	\$57,430.00
4	9/13/06	1192 Huron Lane, Hayward, CA	Doris Anyanwu	Country- wide Bank, N.A.	14457 8964	\$584,000	Alliance Title  11454695- 412	\$595,804.00

5	9/13/06	1192 Huron Lane, Hayward, CA	Doris Anyanwu	Country- wide Bank, N.A.	14457 8956	\$73,000	Alliance Title  11454695- 412	\$73,912.50
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All in violation of Title 18, United States Code, Section 1343.

COUNTS SIX THROUGH NINE: (18 U.S. C. § 1343 - Wire Fraud)

13. The factual allegations contained in paragraphs one through seven and ten are realleged and incorporated by reference as though fully set forth herein.

14. Beginning at a time unknown to the Grand Jury, but no later than on or about September 29, 2006, and continuing until on or about February 12, 2007, in the Northern District of California and elsewhere, the defendants,

ANDREW ASHIEGBU,  
LINDA ASHIEGBU,  
HYACINTH UDEH, and  
URSULA OGAMBA,

did knowingly and intentionally devise a material scheme and artifice to defraud financial and other lending institutions and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by material omissions of fact, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted by means of wire communications in interstate commerce certain writings, signs, and signals, namely, the wire transfers identified below:

Count	Wire Date	Property	Borrower	Financial/ Lending Institution	Loan #	Loan Amount	Escrow Co. & Escrow #	Wire Amount
6	9/29/06	557 Adriatic Court, San Ramon, CA	Hyacinth Udeh	Country- wide Home Loans (dba America's Wholesale Lender)	15060 4758	\$692,000	Alliance Title  1147996 3-412	\$697,722.98

7	9/29/06	557 Adriatic Court, San Ramon, CA	Hyacinth Udeh	Country- wide Bank, N.A.	15060 4750	\$173,000	Alliance Title  1147996 3-412	\$171,999.91
8	2/12/07	2752 Plover Court, Hayward, CA	Hyacinth Udeh	ABN AMRO	65493 0409	\$1,000,000	First American Title  0106- 2649768	\$1,005,611. 32
9	2/12/07	2752 Plover Court, Hayward, CA	Hyacinth Udeh	ABN AMRO	65493 0432	\$135,000	First American Title  0106- 2649768	\$135,717.00

All in violation of Title 18, United States Code, Section 1343.

COUNT TEN: (18 U.S.C. § 1956(h) - Conspiracy to Commit Money Laundering)

15. The factual allegations contained in paragraphs one through seven and ten are realleged and incorporated by reference as though fully set forth herein.

16. Beginning at a time unknown to the Grand Jury, but no later than in or about May 2005, and continuing until in or about February 2007, in the Northern District of California and elsewhere, the defendants,

ANDREW ASHIEGBU,  
LINDA ASHIEGBU,  
DORIS ANYANWU, and  
HYACINTH UDEH,

did knowingly conspire with each other, and with other persons both known and unknown to the grand jury, to commit offenses against the United States, in violation of Title 18, United States Code, Sections 1956 and 1957, to wit:

a. knowing that property involved in a financial transaction represented the proceeds of some form of unlawful activity, and which property was in fact the proceeds of specified unlawful activity, namely, bank fraud and wire fraud, defendants conducted financial transactions knowing that those transactions were designed in whole and in part to conceal and disguise the

1 nature, location, source, ownership, and control of the proceeds of that specified unlawful activity,  
2 in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and

3 b. defendants knowingly engaged in monetary transactions, affecting interstate  
4 commerce, in criminally derived property of a value greater than \$10,000, said property having in  
5 fact been derived from specified unlawful activity, namely, bank fraud and wire fraud, in violation  
6 of 18 U.S.C. § 1957(a).

7 Manner and Means of the Conspiracy

8 17. The manner and means the defendants used to carry out the money laundering  
9 conspiracy included the following:

10 a. Placing fraudulent information on the loan applications, including inflated  
11 gross monthly income to meet the lender's guidelines for loan approval, place of employment, assets,  
12 residential information, and purpose of the loans.

13 b. Providing fraudulent verifications of employment, fraudulent verifications  
14 of rent, fraudulent W-2 forms, altered bank records, and other fraudulent information with the loan  
15 applications submitted to financial and other lending institutions.

16 c. Recruiting defendant Hyacinth Udeh as a straw buyer to purchase defendants  
17 Andrew Ashiegbu's and Linda Ashiegbu's residential property located at 2752 Plover Court,  
18 Hayward, California, which continued to be controlled by defendants Andrew Ashiegbu and Linda  
19 Ashiegbu after its purchase by the straw buyer.

20 d. Providing "show money" to defendant Hyacinth Udeh to deposit into the  
21 escrow account during the period of escrow for the purchase of 2752 Plover Court, Hayward,  
22 California, to defraud lenders into believing that defendant Hyacinth Udeh had more assets than he  
23 actually did.

24 e. Processing the fraudulent loan packages and submitting them to financial and  
25 other lending institutions.

26 f. Causing title company escrows to close with mortgage proceeds that financial  
27 and other lending institutions had funded based upon fraudulent loan packages.  
28



g. Causing financial and other lending institutions to wire the mortgage proceeds through interstate commerce to the title companies handling the escrows in California.

h. Providing the title companies with specific instructions as to how the mortgage proceeds should be disbursed, including amounts that exceed \$10,000.

All in violation of Title 18, United States Code, Section 1956(h).

**COUNTS ELEVEN THROUGH EIGHTEEN: (18 U.S.C. §1957(a) - Monetary Transactions Using Criminally Derived Property)**

18. The factual allegations contained in paragraphs one through eight, ten, and seventeen are realleged and incorporated by reference as though fully set forth herein.

19. On or about the dates listed below, in the Northern District of California and elsewhere, the defendants,

ANDREW ASHIEGBU,  
LINDA ASHIEGBU, and  
DORIS ANYANWU,

did knowingly engage in the monetary transactions listed below, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, as described in Counts Eleven through Eighteen, said property having in fact been derived from specified unlawful activity, namely, wire fraud as alleged in Counts Two through Nine:

Count	Date	Property	Borrower	Escrow Co. & Escrow #	Description of Financial Transaction	Payee/ Recipient
11	7/7/05	1192 Huron Lane, Hayward, CA	Doris Anyanwu	First American Title 0106-1851417	Wire Transfer of \$14,500 into Citibank Acct #40019038807	Linda Ashiegbu
12	9/13/06	1192 Huron Lane, Hayward, CA	Doris Anyanwu	Alliance Title 11454695-412	Deposit of check #68022 for \$91,768.76 into Wells Fargo Bank Acct #530-5726423	Doris Anyanwu

13	9/23/06	1192 Huron Lane, Hayward, CA	Doris Anyanwu	Alliance Title 11454695-412	Deposit of check #15123 for \$29,972.50 into Citibank Acct #201278017	New Era Mortgage
14	9/29/06	557 Adriatic Court, San Ramon, CA	Hyacinth Udeh	Alliance Title 11479963-412	Deposit of check #84697 for \$21,625 into Citibank Acct #201278017	New Era Mortgage
15	11/21/06	557 Adriatic Court, San Ramon, CA	Hyacinth Udeh	Alliance Title 11479963-412	Deposit of check #18956 for \$16,240 into Citibank Acct #201278017	New Era Mortgage
16	2/15/07	2752 Plover Court, Hayward, CA	Hyacinth Udeh	First American Title 0106-2649768	Wire Transfer of \$189,768.85 into Wells Fargo Bank Acct #1965246406	Linda Ashiegbu & Andrew Ashiegbu
17	2/15/07	2752 Plover Court, Hayward, CA	Hyacinth Udeh	First American Title 0106-2649768	Deposit of check #106162462 for \$10,662 into Wells Fargo Bank Acct. #535-7663458	New Era Mortgage
18	2/21/07	2752 Plover Court, Hayward, CA	Hyacinth Udeh	First American Title 0106-2649768	Wire Transfer of \$19,993.00 into Wells Fargo Bank Acct # 1965246406	Linda Ashiegbu & Andrew Ashiegbu

All in violation of Title 18, United States Code, Section 1957(a).

**COUNTS NINETEEN THROUGH TWENTY-TWO: (18 U.S.C. § 911- False Claim to United States Citizenship)**

20. On or about the dates listed below, in the Northern District of California, the defendant,

DORIS ANYANWU,

did falsely and willfully represent herself to be a citizen of the United States on loan applications submitted to financial and other lending institutions for the purchase and/or refinance of real property as set forth below:

Count	Date	Property	Purchase/Refinance	Financial/Lending Institution
19	6/8/05	1192 Huron Lane, Hayward, CA	Purchase	IRES Co.
20	6/8/05	1192 Huron Lane, Hayward, CA	Purchase	IRES Co.
21	9/6/06	1192 Huron Lane, Hayward, CA	Refinance	Countrywide Bank, N.A.
22	9/6/06	1192 Huron Lane, Hayward, CA	Refinance	Countrywide Bank, N.A.

All in violation of Title 18, United States Code, Section 911.

**COUNTS TWENTY-THREE THROUGH TWENTY-EIGHT: (18 U.S.C. § 911- False Claim to United States Citizenship)**

21. On or about the dates listed below, in the Northern District of California, the defendant,

HYACINTH UDEH,

did falsely and willfully represent himself to be a citizen of the United States on loan applications submitted to financial and other lending institutions for the purchase of the real properties as set forth below:

Count	Date	Property	Financial/Lending Institution
23	9/22/06	557 Adriatic Court, San Ramon, CA	Countrywide Home Loans (dba America's Wholesale Lender)
24	9/22/06	557 Adriatic Court, San Ramon, CA	Countrywide Bank, N.A.
25	12/26/06	2752 Plover Court, Hayward, CA	IndyMac Bank
26	12/26/06	2752 Plover Court, Hayward, CA	IndyMac Bank

27	2/3/07	2752 Plover Court, Hayward, CA	ABN AMRO
28	2/3/07	2752 Plover Court, Hayward, CA	ABN AMRO

All in violation of Title 18, United States Code, Section 911.

FORFEITURE ALLEGATION: (18 U.S.C. § 982(a)(2)(A) - Forfeiture of bank/wire fraud proceeds)

22. The factual allegations contained in paragraphs one through seven and ten are realleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 981(a)(2)(A).

23. Upon a conviction of any of the offenses alleged in Counts One through Nine, the defendants,

ANDREW ASHIEGBU,  
LINDA ASHIEGBU,  
DORIS ANYANWU,  
HYACINTH UDEH, and  
URSULA OGAMBA

shall forfeit to the United States all property, constituting and derived from proceeds traceable to said offenses, including but not limited to the following property:

(a) a sum of money not less than \$ 3,679,000 representing the amount of proceeds obtained as a result of the scheme to defraud;

(b) the real property and improvements located at 1192 Huron Lane, Hayward, California;

(c) the real property and improvements located at 557 Adriatic Court, San Ramon, California; and

(d) the real property and improvements located at 2752 Plover Court, Hayward, California.

24. If any of said property, as a result of any act or omission of the defendant-

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

any and all interest defendants have in other property shall be vested in the United States and forfeited to the United States pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION: (18 U.S.C. § 982(a)(1) - Money Laundering Forfeiture)

25. The factual allegations contained in paragraphs one through eight, ten, and seventeen are realleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 982(a)(1).

26. Upon a conviction of any of the offenses alleged in Counts Ten through Eighteen, the defendants,

ANDREW ASHIEGBU,  
LINDA ASHIEGBU,  
DORIS ANYANWU, and  
HYACINTH UDEH,

shall forfeit to the United States any property, real or personal, involved in said money laundering offenses, or traceable to said property, including but not limited to the following property:

(a) a sum of money not less than \$413,125.11 representing the amount of proceeds obtained from the money laundering offenses;

(b) the real property and improvements located at 1192 Huron Lane, Hayward, California;

(c) the real property and improvements located at 557 Adriatic Court, San Ramon, California; and

(d) the real property and improvements located at 2752 Plover Court, Hayward, California.

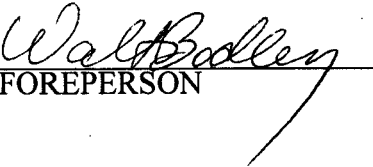
27. If any of said property, as a result of any act or omission of the defendants-

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;


any and all interest defendants have in other property shall be vested in the United States and forfeited to the United States pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b) and Rule 32.2 of the Federal Rules of Criminal Procedure.

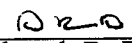
DATED: May 27, 2010

A TRUE BILL.

  
FOREPERSON

JOSEPH P. RUSSONIELLO  
United States Attorney

  
BRIAN J. STRETCH  
Chief, Criminal Division

(Approved as to form: )  
Deborah R. Douglas  
Assistant United States Attorney